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August 29, 2016

VIA ECF

Honorable Jose L. Linares
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *United States v. Anthony Blumberg*, Criminal Docket No. 14-458-JLL

Dear Judge Linares:

We respectfully submit this letter on behalf of Mr. Blumberg to seek a one-week adjournment of the deadline for his submission relating to G-Pro technical issues (the "G-Pro Submission") pursuant to the Court's Order dated August 1, 2016 (the "August 1 Order"). The G-Pro submission is currently due August 31, 2016.

Pursuant to the August 1 Order, the Government, ConvergeX and its experts, and Mr. Blumberg's counsel along with his experts, met on August 17, 2016, to confer on the G-Pro questions ordered by the Court. On August 23, 2016, after reviewing the information learned during the meeting, Mr. Blumberg provided ConvergeX and the Government with follow-up questions and open items from the meeting concerning the laptop and data sets. ConvergeX has stated that it is working to address these questions and intends to provide answers by August 30, 2016.

Thus, Mr. Blumberg respectfully requests a one-week adjournment to September 7, 2016, to submit his update letter to the Court, along with an affidavit from his expert. The short adjournment will allow sufficient time for answers to the questions to be provided, the parties to further confer, if necessary, and Mr. Blumberg and his experts to review all the relevant information in order to provide the G-Pro Submission to the Court. The Government does not object to the adjournment request, and ConvergeX has stated that as a non-party it takes no position as to the request.

We thank the Court for its consideration of this request.

Respectfully submitted,

Levine Lee LLP

/s/ Seth L. Levine

Seth L. Levine

Jillian B. Berman

Christos G. Papapetrou

cc: All parties (via ECF)

SO ORDERED: 

DATED: 8/30/16